

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA §
v. § No. 3:13-CR-360-M
DOMINIC PARKER (1) § ECF

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, Dominic Parker, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- Crime of violence (18 U.S.C. § 3156)
- Maximum sentence life imprisonment or death
- 10 + year drug offense
- Felony, with two prior convictions in above categories
- Serious risk defendant will flee
- Serious risk obstruction of justice
- Felony involving a minor victim
- Felony involving a firearm, destructive device, or any other dangerous weapon

Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

Defendant's appearance as required

Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251

Previous conviction for "eligible" offense committed while on bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

At first appearance

After continuance of 3 days (not more than 3).

DATED this 15th day of October 2013.

Respectfully submitted,

SARAH R. SALDAÑA
UNITED STATES ATTORNEY

s/ John J. Boyle
JOHN J. BOYLE
Assistant United States Attorney
Texas State Bar No. 00790002
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Tel: 214.659.8600
Fax: 214.767.0978
E-Mail: John.Boyle2@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on **October 15, 2013**, I electronically filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court. I do not know the attorney who will represent the defendant; however, I hereby certify that I will hand-deliver a copy of the foregoing document to the attorney or the defendant at the first available opportunity to do so.

s/ John J. Boyle
JOHN J. BOYLE
Assistant United States Attorney